

April 9, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am the Vice President of a meat department for BI-LO, LLC. As such, I am very concerned about the country of origin labeling guidelines that you issued.

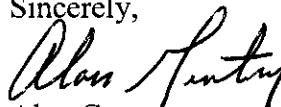
Our meat department offers 212 beef, 15 lamb, 9 veal, 150 pork and 30 ground meat items to consumers on a daily basis. The task of identifying the country in which the underlying animal or animals for each of those products was born, raised and slaughtered is enormous. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a package of hamburger and determine whether the cow was born and raised in Canada or born in the U.S. and raised in Canada or born, raised and slaughtered in the U.S. Moreover, the operational challenges of labeling each of those items for retail sale on a daily basis are substantial.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for cattle, hogs and lamb at birth, feeding and slaughter accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of meat products at retail; and
- Implement reasonable recordkeeping requirements.

Please issue regulations that will be simple to follow and to implement.

Sincerely,



Alan Gentry
Vice President of Meat Marketing
BI-LO, LLC.